

REMARKS

Applicants respectfully request that the above-identified application be reexamined.

The Office Action mailed on December 14, 2004 ("Office Action"), rejected all of the claims remaining in this application. Claims 29-31, 67-69, 101-103, and 105-119 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of the teachings of Lakritz, U.S. Patent No. 6,623,529 (hereinafter "Lakritz").

To address certain comments in the Office Action, the response makes clarifying amendments to the language of Claims 29, 67, and 101. For the reasons more fully discussed below, applicants submit that the rejection of Claims 29-31, 67-69, 101-103, and 105-119 in view of the teachings of the cited reference noted above should be withdrawn and this application allowed.

Prior to discussing the reasons why applicants believe the claims pending in this application are allowable, a brief discussion of the present invention and the cited and applied reference is presented. The following discussions of the present invention and the teachings of the applied reference are not provided to define the scope or interpretation of any of the claims of this invention. Instead, they are provided to help the United States Patent and Trademark Office better appreciate important claim distinctions discussed hereafter.

Summary of the Invention

The present invention addresses the growing need of information providers to provide content that is both interesting and understandable to diverse users from different parts of the world. The process of providing content that is both interesting and understandable to users from diverse locations is known as localization. For example, a Web page written in English that originated in the United States needs to go through a localization process before it is delivered to a user understanding only French or to a user understanding English but living in South Africa.

The essence of the invention is to provide a method, a computer-readable medium having computer-executable instructions, and a computer system for localizing contents for viewers with diverse language backgrounds and/or geographical locations. In particular, the method, the computer-readable medium having computer-executable instructions, and the computer system extracts the localizable portion from a document. The localizable portion is localizable (translatable) according to different languages and/or geographical locations so as to form multiple localized versions. The localized versions can be created by third-party developers, if desired. Regardless of how the localized versions are created, the method, computer-readable medium having computer-executable instructions, and the computer system stores the localized versions, translates each localized version of the localizable content into a plurality of encoded versions, and stores the encoded versions in a directory hierarchy.

In one exemplary embodiment of the invention, the localizable content of a localizable document is isolated from the underlying code by extracting string literals from the code and storing them as symbols. The localizable content is the content that can be localized for a particular user based on the language and/or the geographical location of the user. The localizable content may then be exported to a localizer for translation to localized content in one or more alternate languages. The localized content is stored in a directory hierarchy. The localized content is automatically converted to one or more encoded versions, which are character set supports such as DBCS, Unicode, and UTF-8. These encoded versions are stored in the directory hierarchy as well.

The present invention allows users with different language backgrounds and/or geographical locations to receive content that they are able to understand and find interesting. Further, the present invention uses server resources efficiently. The data storage infrastructure of the present invention allows a server to support multiple languages and to readily support the addition of new languages. Furthermore, the isolation of localizable content from the underlying code preserves the operability of the underlying code when the localizable content is in the

localization process. In addition, the support of different encoded versions allows the localized content to be used on different types of Internet browsers.

Summary of Lakritz

Lakritz purportedly teaches a document localization, management, and delivery system. Lakritz automatically determines the language and the country of a Web site and directs the Web server to deliver the appropriate localized content contained in one or more country/language databases to the visitor's browser. The visitor's browser is notified of the proper font needed to display the selected language and is allowed to download the font.

Lakritz further provides a toolkit that allows a master site to be built that is language and country independent. The actual language content is stored in one or more language/country databases. When a visitor enters the master site, the requested document is automatically served in the visitor's language and for the visitor's country by filling in a document template from the master site requesting the correct language content from the language/country database.

In summary, similar to the present invention, Lakritz teaches a system involving localization and delivery of Internet content. However, nowhere does Lakritz teach extracting a localizable portion of the localizable Internet document so to separate the localizable portion from non-localizable content of the localizable Internet document. Nor does Lakritz teach translating each localized version of the localizable portion into a plurality of encoded versions and storing the encoded versions in a directory hierarchy.

The Claims Distinguished

The Office Action rejected Claims 29-31, 67-69, 101-103, and 105-119 as being anticipated by Lakritz. The Office Action asserts that Lakritz discloses each and every element of applicants' claims. Applicants respectfully disagree. As described in more detail below, Lakritz fails to disclose or suggest certain elements of the independent claims. Applicants

respectfully request reconsideration and allowance of these independent claims and their dependent claims.

A. Independent Claims 29, 67, and 101

The independent Claims 29, 67, and 101 recite a method, a computer-readable medium and a system for generating localized versions of Internet documents according to different languages and/or geographical locations in a manner not taught or suggested by Lakritz. More specifically, Claim 29 is a method claim, Claim 67 is a computer-readable medium claim, and Claim 101 is a computer system claim. All the three claims, in their amended forms, specifically recite:

extracting a localizable portion of a localizable Internet document so to separate the localizable portion from non-localizable content of the localizable Internet document, said localizable portion being localizable according to different languages and/or geographical locations so as to form multiple localized versions;

storing localized versions of the localizable portion in a directory hierarchy;

translating each localized version to a plurality of encoded versions; and

storing the encoded versions in the directory hierarchy.

Lakritz does not teach the subject matter recited in Claims 29, 67, and 101. For example, nowhere does Lakritz teach **"extracting a localizable portion of a localizable Internet document** so to separate the localizable portion from non-localizable content of the localizable Internet document." The portions of the Lakritz text (Col. 4, lines 3-19; Col. 6, lines 50-57; and Col. 26, lines 33-35, and Figure 12) cited in the Office Action appear to teach the subject matter suggested in the Office Action, i.e., automatically determining the language and country of a Web site visitor... delivering the appropriate localized content contained in one or more country/language database and/or file-based content in a file system to the visitor's browser; creating localized content for specific geographic regions or countries; and constructing a

document or form in such a way that it can be automatically localized for different languages and locales. (See Office Action, pages 3-4). The Office Action alleges that Lakritz teaches extracting a localizable portion of a localizable Internet document in that Lakritz teaches documents that need to be translated are extracted from the language and country database. (Office Action, pages 3 and 8.) Applicants respectfully disagree. Documents in a language and country database are not the same as a localizable portion of a localizable Internet document. **A database is not the same as an Internet document.** As known by those of ordinary skill in the art, a database generally refers to data organized and stored on a computer that can be searched and retrieved by a computer program. On the contrary, an Internet document is a document on the World Wide Web, usually is coded with a markup language such as HTML or XML. The markup language adds computer-executable instructions (non-localizable content) to text (localizable content) to form an Internet document.

Further, nowhere does Lakritz teach, in these text portions or anywhere else, "extracting a localizable portion of the localizable Internet document **so to separate the localizable portion from non-localizable content of the localizable Internet document.**" In contrast, Claims 29, 67, and 101, as noted above, clearly recite this subject matter, which satisfies the need to preserve, for example, the operability of the code underlying the content of a document, e.g., HTML formatting. The separation allows the underlying code to be used as a template that represents a basic document framework into which localized content is inserted. In one embodiment of the present invention, fixed and variable portions of a localizable Internet document are identified. The variable portion is isolated, for example, by extracting string literals from the document. Only the localized versions of the variable portion are stored, e.g., in a directory hierarchy, sorted by country and the language. When a client issues a request, a localized document is generated by combining the fixed portion and a selected localized version of the variable portion prior to transmission to a client. Lakritz does not teach the extracting recitation of Claims 29, 67, and 101.

In addition, Lakritz does not teach "translating each **localized version** to a plurality of encoded versions." The portions of the Lakritz text (Col. 4, lines 29-34; Col. 12, lines 29-32; Col. 36, lines 31-35; and Col. 28, lines 15-16) cited in the Office Action appear to teach identifying the encoding of a text so to properly interpret the text for subsequent translation. In other words, Lakritz appears to teach including sufficient information to identify the encoding of **a text that will be translated subsequently**. Nowhere does Lakritz teach translating an already localized content to a plurality of encoded versions, as recited in Claims 29, 67, and 101.

The Office Action correctly concludes that Lakritz does not specifically teach "storing the multiple localized versions of the localizable portion and the encoded versions in a directory hierarchy." However, the Office Action suggests that it would have been obvious to one of ordinary skill in the art at the time of applicants' invention to apply Lakritz's teaching to include storing documents in a directory hierarchy. Applicants categorically disagree with such a suggestion. On the other hand, even if it would have been obvious to apply Lakritz's teaching to include the "directory hierarchy" limitation, Lakritz still would not anticipate the other subject matter of Claims 29, 67, and 101 discussed above.

In summary, there is simply no teaching or suggestion in Lakritz of the subject matter recited in Claims 29, 67, or 101. Thus, applicants submit that Claims 29, 67, and 101 are clearly allowable.

B. Dependent Claims

Since all of the other claims remaining in this application depend from Claims 29, 67, and 101, respectively, these claims are submitted to be allowable for at least the same reasons that Claims 29, 67, and 101 are submitted to be allowable.

CONCLUSION

In view of the foregoing comments, applicants respectfully submit that all of the pending claims in this application are clearly allowable in view of the cited and applied reference. Consequently, early and favorable action allowing these claims and passing this application to issue are respectfully solicited.

Respectfully submitted,

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Date:

March 15, 2005

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